

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

IN THE CIRCUIT COURT OF SUNFLOWER COUNTY, MISSISSIPPI

EUGENIA CAMPBELL and DEMETRIUS CAMPBELL

PLAINTIFFS

v.

Case No. 4:14cv69-DMB-JMV

**CITY OF INDIANOLA, MAYOR STEVE ROSENTHAL,
IN HIS INDIVIDUAL AND OFFICAL CAPACITY, CHIEF RICHARD
O'BANNON, IN HIS INDIVIDUAL AND OFFICIAL
CAPACITY, and OFFICER SCOTT HAGERMAN, IN HIS
INDIVIDUAL AND OFFICIAL CAPACITY**

DEFENDANTS

**PLAINTIFFS' MOTION TO SUPPLEMENT PLAINTIFFS' RESPONSE
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

COMES NOW, Plaintiff Eugenia Campbell and Demetrius Campbell, by and through counsel, and file this, their MOTION TO SUPPLEMENT PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT, and would show unto the Court, the following:

1. Defendants filed their Motion for Summary Judgment on or about September 25, 2014.
2. Plaintiffs filed their Response in Opposition to Defendants' Motion for Summary Judgment on or about October 16, 2014.
3. Plaintiffs' move this Court and request Not Guilty Verdicts to be added to Plaintiffs' Response in Opposition to Defendants' Motion for Summary Judgment.
4. Furthermore, Plaintiffs' move this Court and request Deposition transcripts to be added to Plaintiffs' Response in Opposition to Defendants' Motion for Summary Judgment.

5. Finally, it should be noted that Defendants do not oppose the instant motion.

6. Based on the foregoing, Plaintiffs' motion should be granted.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that this Honorable Court will grant their Motion to Supplement Response adding Not Guilty Verdicts and Deposition transcripts, based upon the reasons and logic set forth herein, as well as, the lack of opposition. Plaintiffs' also pray for all other general relief this Honorable Court deems to be fair and just.

RESPECTFULLY SUBMITTED, this the 17th day of April, 2015.

Eugenia and Demetrius Campbell, Plaintiffs

BY: /s Tangala L. Hollis
CARLOS E. MOORE, MSB #100685
TANGALA L. HOLLIS, MSB #103301

Of Counsel:

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on the 17th day of April 2015, I had this day served via the ECF system, and/or United States mail a true and correct copy of the above to the following counsel of record:

Daniel J. Griffith, Esq.
Michael S. Carr, Esq.
GRIFFITH & GRIFFITH
P. O. Drawer 1680
Cleveland, MS 38732

Gary Austin, Esq.
City Attorney
P. O. Box 1590
Indianola, MS 38751-5398

THIS, the 17th day of April, 2015.

/s Tangala L. Hollis
CARLOS E. MOORE, ESQ.
TANGALA L. HOLLIS, ESQ.
DARRYL A. WILSON, ESQ.